



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 2, 2022

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to defense counsel's request to adjourn the hearing currently scheduled to occur on March 8, 2022 to a date in May 2022. (Dkt. No. 627). The Government strongly opposes defense counsel's request, as an adjournment—let alone a two-month adjournment—is not in the interests of justice. As an initial matter, this case is scheduled for sentencing in June and that date should not be delayed. The victims in this case deserve a timely resolution of this matter.

Nearly one week after the Court issued its Opinion and Order scheduling the March 8, 2022 hearing (Dkt. No. 620), defense counsel filed its adjournment request, citing scheduling conflicts of the defendant's Colorado-based counsel. But the defendant is represented by multiple attorneys, at least two of whom are available.<sup>1</sup> Moreover, because the Court has already ruled that the Court will conduct the questioning of Juror 50, and because the parties have had an opportunity to submit questions for the Court's consideration in advance of the hearing (*id.* at 16-17), the defendant does

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<sup>1</sup> Defense counsel's letter notes that Ms. Sternheim has a trial scheduled to start the following week, on March 16, 2022, but the Government notes that Ms. Sternheim is one of multiple defense attorneys in that case as well.

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not need four attorneys to be present to observe the questioning of Juror 50 and participate in the hearing. Any desire the defendant has to have her four attorneys represent her at the hearing is vastly outweighed by the significant public interest in a speedy resolution of this matter. Accordingly, the Government respectfully requests that the Court deny defense counsel's adjournment request and proceed with the March 8, 2022 hearing as scheduled.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/  
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Southern District of New York

Cc: Defense Counsel (by ECF)